

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

NATHANIEL ROSS, on Behalf of Himself and §
all Others Similarly Situated, §

Plaintiff, §

v. §

FABCO, LLC, §

Defendant. §

CIVIL ACTION NO. 3:21-cv-849-E

PLAINTIFF’S STIPULATION OF DISMISSAL WITH PREJUDICE

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff Nathaniel Ross (“Plaintiff”) hereby files this Stipulation of Dismissal of the above-captioned case with Prejudice, respectfully showing as follows:

1. Defendant FABco, LLC (“Defendant”) consents to this Stipulation of Dismissal with Prejudice pursuant to Rule 41(a)(1)(A)(ii) as shown by the signature of its counsel below.

2. There are no pending motions before the Court as of the filing of this document. No motion for collective action certification under the Fair Labor Standards Act (“FLSA”) was filed and there are no FLSA opt-in plaintiffs in this case.

3. By the signatures of their counsel of record below, Plaintiff and Defendant (collectively the “Parties”) hereby dismiss all claims and/or counter-claims in the above-captioned lawsuit with prejudice with the respective Parties bearing their own court costs and attorney’s/attorneys’ fees except as otherwise agreed by the Parties.

4. This stipulation is effective upon filing of this document and no Court order is required pursuant to Federal Rule of Civil Procedure 41(a)(1)(A).

Date: August 30, 2021.

Respectfully Submitted,

s/ Allen R. Vaught

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF CONFERENCE

Counsel for Plaintiff and Defendant conferred on the subject matter of this document on August 30, 2021 and counsel for Defendant indicated that Defendant agrees with the filing of this document.

s/Allen R. Vaught

Allen R. Vaught

CERTIFICATE OF SERVICE

On August 30, 2021, I electronically submitted the foregoing document with the Clerk of Court for the United States District Court, Northern District of Texas, using the CM/ECF method. I certify that I have served all counsel of record electronically.

s/Allen R. Vaught

Allen R. Vaught